

### Remarks

Regarding the 112 objection, the definition of production system as used herein is any system that assists in the production of one or more products. The language in the specification was intended to ensure that "production system" was not limited to things that produce, and that the word "group" was not limited to two or more: it could apply to one.

Although a production system could, as is obvious from its name, produce something, on the other hand, a production system need not produce anything by itself: a production system may simply test the output produced by another production system. The production system may be made up of one or more tool groups, logically related to one another in some way. Each tool group may be made up of one or more tools: the use of the word group should not imply that more than one tool is required. Each tool may simultaneously process one or more units of the production process, though tools may of course, also process units sequentially or other ways.

The specification having been clarified, Examiner is respectfully requested to withdraw the objection.

Regarding the 102 rejection, the claims recite,  
receiving or receive "a quantity of time during which the  
second set of at least one tool is not able to control the  
first set of at least one tool."


5       None of the references discloses or suggests receiving  
a quantity of time which the second set of at least one  
tool is not able to control another set of at least one  
tool. Column 2, lines 43-52 of Berman do mention tool  
availabilities, but this relates to the tool itself, and  
10 does not relate to times that one tool cannot control any  
others as claimed. There is no teaching or suggestion  
regarding any quantity of time which one tool group cannot  
control another tool group: the availabilities appear to  
concern the availability of a tool itself.

15       Thus, the claims are distinguishable over Berman.

Claims 1-29 are distinguishable over all cited  
references. Favorable action is solicited.

Respectfully submitted,  
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